

CJ-17-5133  
Stuenkel



IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

CORTNEY DAWSON,

Plaintiff,

vs.

D&M CARRIERS, LLC d/b/a  
FREYMILLER, INC., a  
domestic limited liability  
company,

Defendant.

SEP 11 2017

RICK WARREN  
COURT CLERK

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Case No. CJ-2017-

**CJ-2017-5133**

**PETITION**

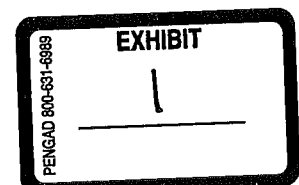
Plaintiffs, Courtney Dawson, brings this cause of action against D&M Carriers, LLC d/b/a Freymiller, Inc. ("Freymiller") and states as follows:

**Nature of Action & Introduction**

1. Plaintiff files this action seeking damages from Defendant for its unlawful treatment of her during her time of employment with Defendant.
2. Defendant treated Plaintiff differently and unlawfully discriminated against her because of her complaints of sexual harassment and her pregnancy.

**Jurisdiction and Venue**

3. All of the claims herein arose in Oklahoma County, Oklahoma.
4. Defendant conducts business in Oklahoma County, Oklahoma.



### **Facts**

5. Defendant hired Plaintiff as a driver on or about February 18, 2015.
6. Plaintiff notified Defendant she was pregnant in October 2015.
7. Defendant's employees made verbal threats toward Plaintiff and her unborn child due to the accommodations necessary for her pregnancy.
8. Plaintiff complained about the threats to Defendant in November 2015.
9. In November 2015, Plaintiff requested job promotions, job transfers, and any possible accommodation to be away from the employees that made verbal threats; however, she was denied because she was told that her pregnancy requires too many doctor appointments.
10. In December 2015, Plaintiff notified Defendant that she was placed on medical restrictions related to her pregnancy.
11. On or about January 30, 2016, Plaintiff was terminated because of her pregnancy, because of her previous complaints of harassment, and because of her requests for accommodation.

### **Relief Requested**

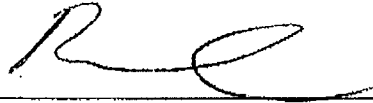
12. Defendant must pay Plaintiff all lost earnings, past and future. This amount has not been calculated as of this date. Plaintiff anticipates hiring an economist for proper calculation of this element of damages.

13. Defendant must pay compensatory damages including, but not limited to, pecuniary losses, emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other nonpecuniary losses, which amounts to the statutory maximum of \$300,000.00.
14. Defendant's actions were willful, wanton, or, at the least, in reckless disregard of Plaintiff's rights; therefore, Plaintiff is entitled to punitive damages.
15. Defendant must pay Plaintiff her attorneys' fees, costs, and all other relief Plaintiff is entitled to because of Defendant's actions. This amount has yet to be fully determined and increases as the case progresses.

**Demand for a Jury Trial**

16. The Plaintiff demands a jury trial for all issues of fact presented by this action.

Respectfully submitted,



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D. Colby Addison, OBA #32718

Chris Hammons, OBA #20233

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ATTORNEYS FOR PLAINTIFF

**ATTORNEY LIEN CLAIMED**